

**TROY LAW, PLLC**

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February 19, 2023

**Via ECF**

Hon. Barbara Moses, U.S.M.J.  
United States District Court  
Southern District of New York  
500 Pearl St.  
New York, NY 10007-1312

**Re: Plaintiffs' Request for Dispositive and Class Motion Briefing and Trial Date  
Chen et al v. Dun Huang Corp et al, No. 19-cv-11883 (GBD), (S.D.N.Y.)**

Dear Hon. Moses,

This office represents the Plaintiffs JINXIONG CHEN and CHAN YIN LAU in the above-captioned matter. We write respectfully to certify the close of discovery, *see* Docket Entry No. 124 (June 6, 2022), noting that the discovery deadline is June 15, 2022, whereby a conference was held with respect to missing names on the name list of employees on the name list.

The last conference was on June 27, 2022, where the parties discussed Defendants failure to provide plaintiffs with an accurate list of employees that worked with Defendants through the collective period that Your Honor set. At the conference Your Honor states that Defendants shall produce a revised employee list or spreadsheet to plaintiff by July 5, 2022. Additionally, plaintiff shall send the previously authorized notice to the remaining plaintiffs Du, Gao and Sun by July 12, 2022, and those plaintiffs will have thirty (30) days to opt-into the lawsuit. *See* Dkt. No. 132 Defendants send their revised excel spreadsheet on July 5, 2022, with two phone numbers and one address.

Since July 5, 2022, the case has not moved and as a result, plaintiff respectfully request that Your Honor set a briefing schedule for dispositive motions, including Rule 23 class action motion to be set after the dispositive motion (if any) is decided, in the matter. Afterwards, we anticipate dates to be set for pretrial filing in which the parties could expect the case to go to trial in the matter.

Plaintiff thanks the courts time and consideration in the above referenced matter.

Respectfully submitted,

/s/ John Troy  
John Troy  
Aaron Schweitzer  
Tiffany Troy  
*Attorney for Plaintiffs*

cc: via ECF all counsel of record  
JT/gdmh